

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : DATE FILED: _____

 v. : CRIMINAL NO. _____

KIMORN BOWES : VIOLATIONS:
 : 18 U.S.C. § 2113(a)
 : (bank robbery - 2 counts)
 : 18 U.S.C. § 2113(d) (armed
 : bank robbery - 2 counts)
 : 18 U.S.C. § 924(c) (1)
 : (branchishing a firearm
 : during a crime of violence -
 : 2 counts)

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about December 17, 2004, at Media, in the
Eastern District of Pennsylvania, defendant

KIMORN BOWES

knowingly and unlawfully by force and violence, and by
intimidation, took from employees of the Iron Workers Bank,
3 State Road, Media, Pennsylvania, lawful currency of the
United States, that is, approximately \$9,421, belonging to,
and in the care, custody, control, management and possession
of the Iron Workers Bank, the deposits of which were and are
insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code,
Section 2113(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 4, 2005, at Philadelphia, in the Eastern District of Pennsylvania, defendant

KIMORN BOWES

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Wachovia Bank, 7636 City Line Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$250, belonging to, and in the care, custody, control, management and possession of the Wachovia Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2005, at Philadelphia, in the Eastern District of Pennsylvania, defendant

KIMORN BOWES

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Wachovia Bank, 6208 Lancaster Avenue, Philadelphia, Pennsylvania, lawful currency of the United States, that is, approximately \$4,820, belonging to, and in the care, custody, control, management and possession of the Wachovia Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, defendants KIMORN BOWES knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Wachovia Bank, by use of a dangerous weapon, that is, a handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 5, 2005, at Philadelphia,
in the Eastern District of Pennsylvania, defendant

KIMORN BOWES

knowingly used, carried, and brandished a firearm, that is,
a handgun, during and in relation to a crime of violence for
which he may be prosecuted in a court of the United States,
that is, the armed bank robbery of Wachovia Bank, in
violation of 18 U.S.C. § 2113.

In violation of Title 18, United States Code,
Section 924(c)(1).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 19, 2005, at Media, in the Eastern District of Pennsylvania, defendant

KIMORN BOWES

knowingly and unlawfully by force and violence, and by intimidation, took from employees of the Iron Workers Bank, 3 State Road, Media, Pennsylvania, lawful currency of the United States, that is, approximately \$3,388, belonging to, and in the care, custody, control, management and possession of the Iron Workers Bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation, and in so doing, defendant KIMORN BOWES knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Iron Workers Bank, by use of a dangerous weapon, that is, a handgun.

In violation of Title 18, United States Code, Section 2113(d).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 19, 2005, at Media,
in the Eastern District of Pennsylvania, defendant

KIMORN BOWES

knowingly used, carried, and brandished a firearm, that is,
a handgun, during and in relation to a crime of violence for
which he may be prosecuted in a court of the United States,
that is, the armed bank robbery of Iron Workers Bank, in
violation of 18 U.S.C. § 2113.

In violation of Title 18, United States Code,
Section 924(c)(1).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney